

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Western District of TexasUnited States of America
v.

Federico QUEJ-Li

*Defendant(s)*Case No. 3:19-mj-9822-~~HTB~~
2019 DEC -9 AM 11:11
Lg

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/29/2019 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section*
Title 18 U.S.C. § 1001 (a)(2)*Offense Description*
Knowingly and Intentionally make any false, fictitious or fraudulent statements or representations.

Title 18 U.S.C. § 371

Conspiracy to defraud the United States.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.*Complainant's signature*PATRIK D. PINON, HSI Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: _____

*Judge's signature*City and state: El Paso, TexasANNE T. BERTON - U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

On or about November 29, 2019, Guatemalan citizens Federico QUEJ-Li and a female juvenile known as H.G.P.Q., were encountered by United States Border Patrol Agents after entering the United States near El Paso, Texas. The location at which the two entered the United States has not been designated as an official port of entry by an Immigration Officer of the United States. QUEJ-Li and H.G.P.Q. presented themselves as a family unit using Guatemalan identification Registro Nacional de las Personas (RENAP) documents as proof.

QUEJ-Li was served with his Miranda Rights, Consent to Collect DNA for purposes of establishing parental relationship, Title 18 United States Code – Section 1001, and Consent to Search an Electronic Device forms in the Spanish language. A DNA test conducted by Homeland Security Investigations (HSI) Special Agents (SAs) revealed that parent/child relationship was negative with a probability of 0.00%.

During an HSI-led interview with QUEJ-Li and H.G.P.Q., QUEJ-Li claimed he and H.G.P.Q. left Guatemala approximately fifteen (15) days prior to November 29, 2019, having traveled by bus through major Mexican cities until arriving in Ciudad Juarez, Mexico. QUEJ-Li said he and H.G.P.Q.'s final destination in the United States was Dover, Ohio, where his sister and brother in law reside. QUEJ-Li stated that in Dover, Ohio, he had a job lined up through his brother-in-law and that H.G.P.Q. would attend school. HSI SAs asked QUEJ-Li for his brother in law's phone number in Dover, Ohio, and because he could not remember it he had H.G.P.Q. write the number.

QUEJ-Li was asked what H.G.P.Q.'s date of birth was and even though he provided the date printed on H.G.P.Q.'s RENAP document, he did not acknowledge it was her birthday on the day of the interview (November 29).

HSI QUEJ-Li was then advised by HSI SAs of the DNA results at which point QUEJ-Li admitted that H.G.P.Q. was not his daughter. QUEJ-Li admitted that he lied and that H.G.P.Q. was indeed his niece. QUEJ-Li was in the process of returning H.G.P.Q. to her mother and father in Dover, Ohio.

HSI SAs asked H.G.P.Q. to write down her true name. H.G.P.Q. wrote down a different name from the one indicated on her RENAP document, provided by QUEJ-Li. H.G.P.Q.'s father was contacted in Dover, Ohio, and he provided H.G.P.Q.'s true identity, matching the name H.G.P.Q. wrote down. QUEJ-Li admitted that it was his idea to travel with H.G.P.Q., posing as his daughter, to defraud United States immigration authorities and be released as a family unit so that they may travel to Dover, Ohio.

QUEJ-Li admitted he was using a different child's RENAP document for H.G.P.Q. and that he reached out to his brother-in-law (H.G.P.Q.'s father) to request using her for his illegal entry into the United States. In a brief subsequent phone call, the minor's father in Ohio indicated he and his wife agreed to have the minor's uncle travel with her to the U.S. for the purpose of facilitating illegal entry into the U.S. as fraudulent family unit.